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Attorneys for Defendants Bank of America, N.A.,
successor by merger to BAC Home Loans Servicing, LP
fka Countrywide Home Loans Servicing LP; ReconTrust
Company, N.A.; Mortgage Electronic Registration
Systems, Inc.; Christina Balandran; and Daniel
Rodriguez

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

LISA CARRIGAN, individually, and D.
JACK SCHICKLING and J. LAUREN
SCHICKLING, husband and wife,

Plaintiffs,

v.

FIRST AMERICAN TITLE INSURANCE
COMPANY, REGIONAL TRUSTEE
SERVICES CORPORATION, FIDELITY
NATIONAL TITLE INSURANCE
COMPANY, RECONTRUST COMPANY
N.A., GN MORTGAGE LLC,
GUARANTY BANK F.S.B., BAC HOME
LOANS SERVICING, COUNTRYWIDE
HOME LOANS SERVICING LP, BANK
OF AMERICA N.A., MORTGAGE
ELECTRONIC REGISTRATION
SYSTEMS, ELAINE LOUISE HOWARD,
CHRISTINA BALANDRAN, DANIEL
RODRIGUEZ, and LINDA GREEN,

Defendants.

Case No. 6:13-cv-00902-TC

**DEFENDANTS BANK OF AMERICA,
N.A., RECONTRUST COMPANY, N.A.,
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.,
CHRISTINA BALANDRAN AND
DANIEL RODRIGUEZ'S MOTION TO
DISMISS PLAINTIFFS' COMPLAINT**

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LR 7.1(a) CERTIFICATION

Counsel for Defendants Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP fka Countrywide Home Loans Servicing LP, ReconTrust Company, N.A., Mortgage Electronic Registration Systems, Inc., Christina Balandran, and Daniel Rodriguez (collectively, “Defendants”) certifies that on August 5, 2013, he attempted in good faith to contact counsel for Plaintiffs to confer regarding this motion.

MOTION

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants, by and through their counsel of record, James P. Laurick, Kilmer, Voorhees & Laurick, PC, respectfully move this Court to dismiss Plaintiffs’ claims against them in the Complaint for failure to state a claim upon which relief can be granted. In support of this Motion, Defendants rely upon the pleadings and documents on file, and the supporting Memorandum, Request for Judicial Notice, and accompanying Declaration of James P. Laurick filed concurrently herewith.

DATED: August 5, 2013.

KILMER, VOORHEES & LAURICK, PC

By _____
James P. Laurick, OSB # 82153
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Company, N.A.; Mortgage Electronic Registration
Systems, Inc.; Christina Balandran; and Daniel Rodriguez

CERTIFICATE OF SERVICE

I certify that on this 5th day of August, 2013, the foregoing **DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT** will be served in accordance with the Court's CM/ECF system which will send notification of such filing by notice via email to said persons a true copy thereof.

AND

I certify that on this 5th day of August, 2013, the foregoing **DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT** was served on the following by ☐ hand delivery ☐ overnight delivery ☐ fax ☐ fax and mail ☒ mailing by depositing with the U.S. mail in Portland, Oregon, enclosed in a sealed envelope with first class postage prepaid. Addressed as follows:

Lisa Carrigan
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Veneta, OR 97487

Plaintiff Pro se

D. Jack Schlicking
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Plaintiff Pro se

J. Lauren Schickling
P.O. Box 430
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Plaintiff Pro se

KILMER, VOORHEES & LAURICK, P.C.

/s/ James P. Laurick

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Of Attorneys for Defendants

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